



2602 Jackson Bluff Road, Tallahassee, Florida 32304, (850) 891-4YOU (4968), talgov.com

April 16, 2004

VIA HAND DELIVERY

Hamilton S. Oven, Jr., Administrator
Siting Coordination Office
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Arvah B. Hopkins Generating Station Unit No. 2, No. PA-74-03H
Postcertification Amendment to Site Certification Application
Temporary Combustion Turbines

Dear Mr. Oven:

Enclosed for your information and review is a Postcertification Amendment to the Site Certification Application for the City of Tallahassee's (City) Arvah B. Hopkins Generating Station, Unit No. 2, No. PA-74-03, submitted pursuant to Rule 62-17.205, Florida Administrative Code. As we discussed at our meeting on April 13, 2004, the City plans to install twenty-three (23) small (nominal 5.5 megawatts each), natural gas-fired simple-cycle combustion turbines and associated facilities at the Arvah B. Hopkins Generating Station on a temporary basis. The City will install no permanent structures nor add any impervious surface. The circumstances and other features of this Postcertification Amendment are more fully detailed in our "Request for Modification of Power Plant Site Certification" which the City is filing contemporaneously.

As we also discussed, the City is applying for a minor source air construction permit to authorize operation of the combustion turbines for limited hours during the upcoming summer months, as well as a modification of the conditions of certification to address limited operation of the units. We understand from our conversation earlier this week that the units can be brought onto the site and the wiring can be installed prior to issuance of the air construction permit and modification if there are no objections to this Postcertification Amendment. Operation of the units will not occur, however, until the air construction permit and site certification modification are both issued.

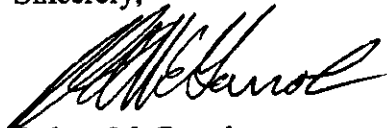
Letter to Hamilton S. Oven, Jr.
April 16, 2004
Page 2

Attachment # 2
Page 2 of 19

In an attempt to shorten the time frames typically involved with Postcertification Amendments such as this, we plan to contact the parties to the original certification as well as all affected agencies to request a waiver of the 30-day period within which to comment and to confirm that they have no concerns with the proposed amendment.

The City sincerely appreciates your attention to this matter and for working with us on an expedited basis. If you have any questions or need any additional information concerning this request, please let me know as soon as possible.

Sincerely,



Robert McGarrah
Manager, Production Division

cc: Scott Goorland, Esq., DEP OGC
Kathy Carter, DEP Clerk
Mary Jean Yon, DEP NW District
Gerald Neubauer, DEP NW District

Parties to the original certification:

Mary Ann Helton, Esq., Florida Public Service Commission
Paul Darst, Department of Community Affairs ✓
Craig Varn, Department of Community Affairs ✓
James Antista, Florida Fish and Wildlife Conservation Commission ✓

Trapp & Dean

Affected agencies:

Duncan Cairns, Northwest Florida Water Management District
Sheouching Yu, Esq., Department of Transportation
Parwez Alam, Leon County
Earl Peterson, Department of Agriculture and Consumer Services

Letter to Hamilton S. Oven, Jr.
April 16, 2004
Page 3

Attachment # 2
Page 3 of 19

bcc: Jennette Curtis, COT
John Powell, COT
Triveni Singh, COT
Ken Kosky, Golder
Gary Sams, HGS
Angela Morrison, HGS

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

In the Matter of:

City of Tallahassee

Arvah B. Hopkins Generating Station, Unit No. 2

Leon County, Florida

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)
)

Certification No. PA-74-04

POSTCERTIFICATION AMENDMENT

The City of Tallahassee (the City), by and through undersigned counsel, pursuant to Rule 62-17.205(1), Florida Administrative Code (F.A.C.), submits a Postcertification Amendment to its Site Certification Application for the Arvah B. Hopkins Generating Station, Unit No. 2, PA 74-03, as specified herein.

As provided under Rule 62-17.205(1), F.A.C., if material changes to a certified facility are proposed to include designs or facilities other than as originally described in the application as certified, then a Postcertification Amendment to the application shall be filed with the Department, all affected agencies, and parties to the original proceeding. The City is planning to install and eventually operate, if necessary, twenty-three (23) small (nominal 5.5 megawatt each) simple-cycle natural gas-fired combustion turbines on a temporary and limited basis. Attached as Exhibit A is a new site plan for the Arvah B. Hopkins Generating Station identifying the location of the temporary units. The units would be operated up to a total maximum of 11,500 hours combined, from May 25, 2004, through September 30, 2004.

This Postcertification Amendment addresses only installation and not operation of these small, temporary units. A separate request for modification is being submitted simultaneously with this Postcertification Amendment for authorization to operate the units.

As also provided under Rule 62-17.205(1)(d), F.A.C., a Postcertification Amendment is appropriate where there are no additional significant adverse impacts and the conditions of

certification need not be changed. The small units will be brought in and remain on tractor trailers for only a few months. The installation of the units will be temporary and will not impact any wetland areas or result in any additional impervious^{areas}. The City also performed a threatened and endangered species survey confirming no such species or habitat exists within the area proposed for the location of the project. The City has also confirmed that installation of the units will not result in any new or changed conditions of certification. Because the installation of these units will not result in any significant adverse impacts or change in conditions of certification, a Postcertification Amendment is therefore appropriate.

Respectfully submitted this 16th day of April, 2004.

HOPPING GREEN & SAMS, P.A.



Gary P. Sams, Esq.
Florida Bar No. 134594
Angela R. Morrison, Esq.
Florida Bar No. 855766
P.O. Box 6526
Tallahassee, FL 32314
Tel: (850) 222-7500

ATTORNEYS FOR THE CITY OF TALLAHASSEE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and three copies of the foregoing have been furnished by hand-delivery to the Siting Coordination Office of the Department of Environmental Protection, 2600 Blair Stone Road, 6th Floor, Tallahassee, Florida 32399, and that copies of the foregoing have been furnished to the following by U.S. Mail (unless otherwise noted) on this 16th day of April, 2004:

Kathy Carter, Clerk
Office of General Counsel
Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399
(by Hand Delivery)

Parwez Alam
Leon County Administrator
Leon County Courthouse
310 S. Monroe Street
Tallahassee, FL 32301

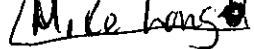
James Antista, Esq.
Florida Fish and Wildlife Conservation Comm.
Bryant Building
620 S. Meridian Street
Tallahassee, FL 32399-1600

Duncan Cairns, Bureau Chief
Environmental Resource Planning
Northwest Florida Water Management District
81 Water Management Drive
Havana, FL 32333-4712

Mary Ann Helton, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Gerald Neubauer
Northwest District Office
Department of Environmental Protection
2815 Remington Green Circle, Suite A
Tallahassee, FL 32308


Hamilton S. "Buck" Oven, Jr.
Administrator, Office of Siting Coordination
Department of Environmental Protection
2600 Blair Stone Road, MS 48
Tallahassee, FL 32399-2400
(by Hand Delivery)

~~Frank Robinson~~, Director 
Division of Forestry
Department of Ag. and Consumer Services
3125 Conner Blvd., C-19
Tallahassee, FL 32399-1650

Craig Varn, Esq.
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

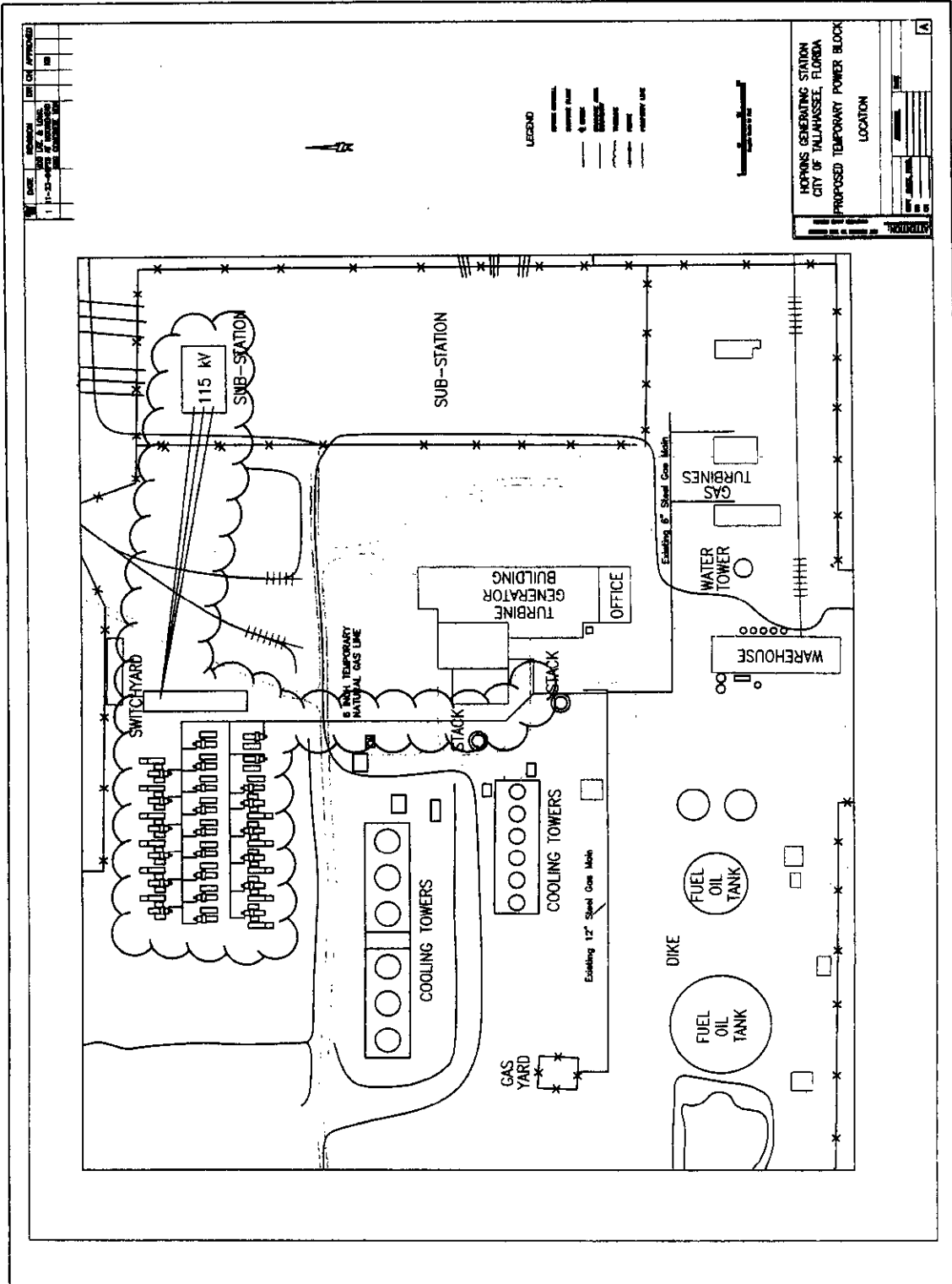
Mary Jean Yon, Director
Northwest District Office
Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32502-5794

Sheouching Yu, Esq.
Department of Transportation
Office of General Counsel
605 Suwanee Street, M.S. 28
Tallahassee, FL 32399


ATTORNEY

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Exhibit A





Attachments 2
Page 9 of 17

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

In the Matter of)	
City of Tallahassee)	
Arvah B. Hopkins Generating Station, Unit No. 2)	Certification No.: PA 74-03
Modification of Conditions of Certification)	OGC Case No. _____
Leon County, Florida)	
_____)	

**REQUEST FOR MODIFICATION OF
POWER PLANT SITE CERTIFICATION**

The City of Tallahassee (the "City"), by and through undersigned counsel, pursuant to Section 403.516(1)(b), Florida Statutes, Rules 62-17.205(1) and 62-17.211(1) & (4), Florida Administrative Code (F.A.C.), and Condition of Certification Number XI, submits a request for modification of the Site Certification for its Arvah B. Hopkins Generating Station Unit No. 2, PA 74-03, as specified herein.

1. The Florida Pollution Control Board issued the Site Certification for the Arvah B. Hopkins Generating Station, Unit 2, on May 20, 1975. This certification authorized the construction and operation of a 238-megawatt ("MW") (nominal) steam electric power plant and ancillary facilities, known as Arvah B. Hopkins Generating Station, Unit No. 2. The Department of Environmental Protection has subsequently modified the Site Certification on seven different occasions by final orders. Hopkins Unit No. 2 and associated facilities have been constructed and are operating in compliance with the existing conditions of certification.

2. This submittal requests approval for the temporary, limited operation of twenty-three small (nominal 5.5 MWs each) simple-cycle combustion units to be located within the area previously certified for Hopkins Unit No. 2. The combustion turbines will be fueled exclusively with natural gas that is already available at the site and will be mounted on trailer beds. The new units will be operated during periods of electric demand when other existing generating units,

power supply agreements, and other steps to be implemented by the City are unable to meet demand for electricity on the City's electric system. The proposed activity is needed to provide temporary, incremental electrical generating capacity for the City of Tallahassee's electric customers while necessary repairs resulting from a forced shutdown are made to the City's Purdom Generating Station, Unit No. 8. The small combustion turbines will only be used as needed for a maximum of 11,500 hours combined, beginning on or about May 25, 2004 through September 30, 2004. The proposed project will require issuance of a federally enforceable air construction permit, thus requiring "modification" of the site certification as well.

3. The air construction permit application has been separately submitted and is attached and incorporated herein as Exhibit A. This application provides information regarding the proposed air combustion turbine units.

4. The City's combustion turbine project will not result in any additional impervious surface, and the City will comply with the requirements of Chapter 62-25, Florida Administrative Code, to ensure proper drainage and erosion control. To support the temporary combustion turbines, a three-inch temporary layer of gravel will be installed in the area of the temporary units (covering 160,000 square feet). This gravel will be removed once the temporary units have been removed from the site.

5. The City has performed a survey for threatened and endangered species on the Hopkins Generating Station Site, and the survey indicated that no such species or their habitats would be affected by the proposed location of the combustion turbine project. This survey is included as Exhibit B.

6. The location of the combustion turbines and associated facilities will not impact any wetlands.

7. The combustion turbines, when operated, are expected to result in a noise level of approximately 85 decibels at a distance of three feet from the units. The nearest residence is located approximately 1,350 feet from the combustion turbines. The projected noise level at the nearest residence would therefore be approximately 45.6 decibels, which is well below the U.S. Environmental Protection Agency noise guideline of 55 decibels.

8. Pursuant to Section 403.516(1)(b), Florida Statutes, the Florida Department of Environmental Protection is authorized to modify the City's Site Certification and thereby authorize operation of the proposed combustion turbines if no party to the certification hearing objects in writing within 45 days after notice by mail to such party's last address of record, and if no other person whose substantial interests will be affected by the modification objects in writing within 30 days after issuance of public notice.

WHEREFORE, Tallahassee requests that the Department:

- a. Provide public notice of this requested modification;
- b. If no party to the certification hearing objects in writing to the Proposed Order Modifying Site Certification within 45 days after notice by mail to such party's last address of record (or earlier if the parties waive the 45-day period and notify the Department that they have no objections), and if no other person whose substantial interests will be affected by the modification objects in writing within 30 days after issuance of public notice, issue a final order granting the modification requested herein; or
- c. If waiver does not occur, or if objection does occur, set this matter for consideration of an immediate final order by the Siting Board, pursuant to Section 120.569(2)(n), Florida Statutes, no later than the Siting Board's regularly scheduled meeting of May 25, 2004; and

d. Provide the City of Tallahassee with all other relief to which it may be entitled.

Respectfully submitted this 16th day of April, 2004.

HOPPING GREEN & SAMS, P.A.



Gary P. Sams, Esq.
Florida Bar No. 134594
Angela R. Morrison, Esq.
Florida Bar No. 855766
P.O. Box 6526
Tallahassee, FL 32314
Tel: (850) 222-7500

ATTORNEYS FOR THE CITY OF TALLAHASSEE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing have been furnished by hand-delivery to Kathy Carter, Agency Clerk, Office of General Counsel, Department of Environmental Protection with a copy and check in the amount of \$10,000 to Hamilton S. Oven, Jr. in the Siting Coordination Office of the Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399, and that copies of the foregoing have been furnished to the following by U.S. Mail on this 16th day of April, 2004:

Parwez Alam
Leon County Administrator
Leon County Courthouse
310 S. Monroe Street
Tallahassee, FL 32301

Gerald Neubauer
Northwest District Office
Department of Environmental Protection
2815 Remington Green Circle, Suite A
Tallahassee, FL 32308

James Antista, Esq.
Florida Fish and Wildlife Conservation Comm.
Bryant Building
620 S. Meridian Street
Tallahassee, FL 32399-1600

Earl Peterson, Director
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Department of Ag. and Consumer Services
3125 Conner Blvd., C-19
Tallahassee, FL 32399-1650

Duncan Cairns, Bureau Chief
Environmental Resource Planning
Northwest Florida Water Management District
81 Water Management Drive
Havana, FL 32333-4712


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2555 Shumard Oak Boulevard
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Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32502-5794

Sheouching Yu, Esq.
Department of Transportation
Office of General Counsel
605 Suwanee Street, M.S. 28
Tallahassee, FL 32399

Attachment # 2
Page 13 of 17



Attorney

Air Construction Permit Application – Temporary Gas Turbines

Arvah B. Hopkins Electric Generating Station



April 16, 2004

City of Tallahassee
Your Own Utilities™



Prepared by
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653



THE PHOENIX ENVIRONMENTAL GROUP, INCORPORATED

2916 East Park Avenue • Tallahassee, FL 32301

Telephone: (850) 878-3331
FAX: (850) 878-2383

April 14, 2004

Mr. Phil Bucci
City of Tallahassee
Arvah B. Hopkins Generating Station
1125 Geddie Road
Tallahassee, Florida 32304

RE: Threatened & Endangered Species Survey
Temporary Generator Storage Area

Dear Phil,

On April 14, 2004, Ms. Jackie Fry of The Phoenix Environmental Group, Inc. (Phoenix Environmental) conducted a threatened and endangered species survey of the area to the north of the cooling towers in the approximate center of the Hopkins Generating Station facility (Figures 1 & 4). This area is intended for use as storage of temporary generators, which will be housed inside semi-trailers. The area consists of planted grass that is routinely mowed and maintained (see attached photographs). There is a ditch on the south side of the area that contains ruderal species, as well as wetland vegetation, including a few cattails along the western side.

No threatened and endangered species, or evidence thereof, were observed during the field investigation of the area intended for the temporary generators. No other conditions of concern were noted that would preclude use of this area for the purpose of storing generators in semi-trailers.

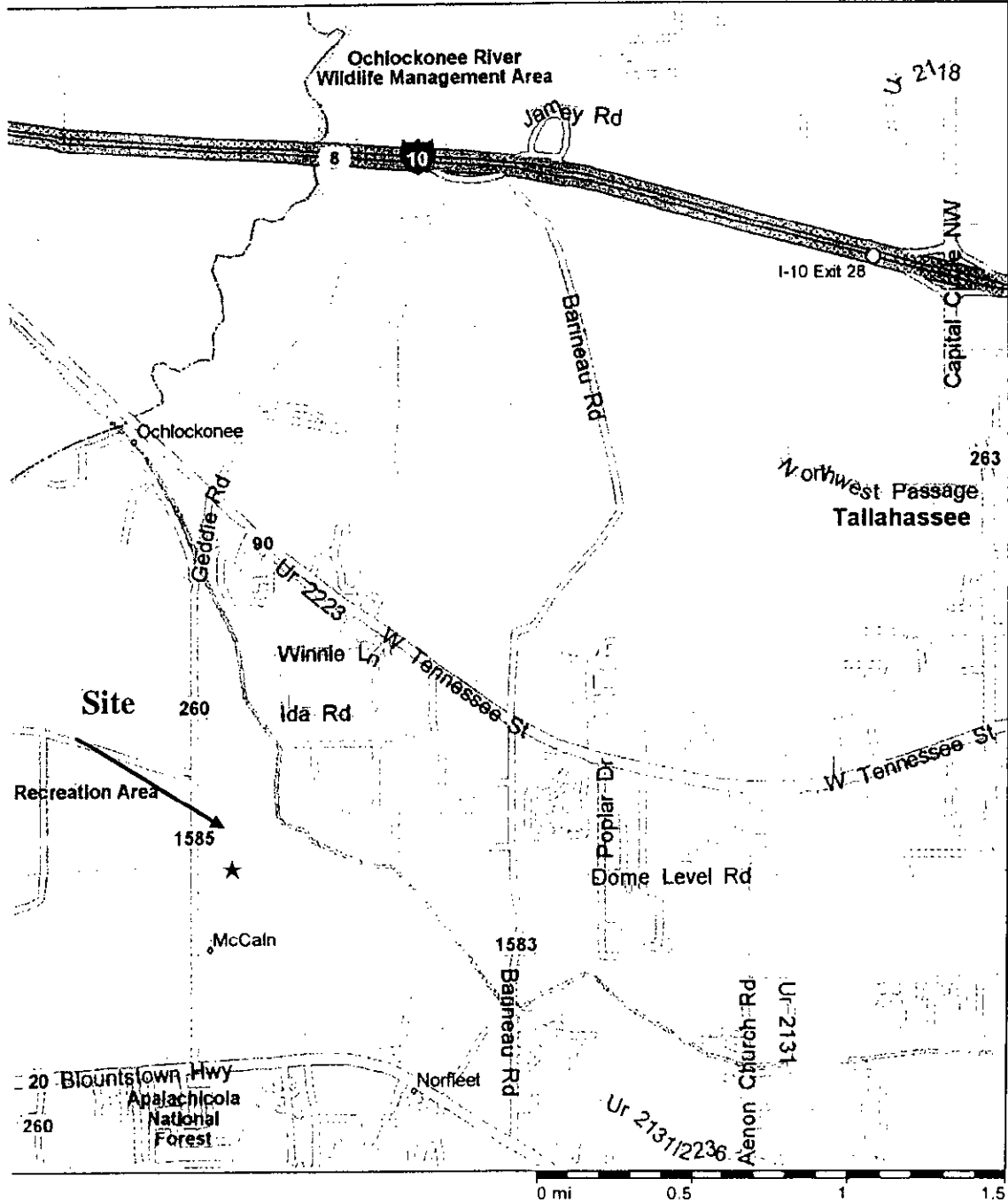
Thank you for the opportunity to assist the City with this project. Please give me a call at 850/878-3331 if you have any questions regarding this letter report.

Sincerely,

Jackie L. Fry
Vice President

/jlf
Enclosures

Ochlockonee, Florida, United States

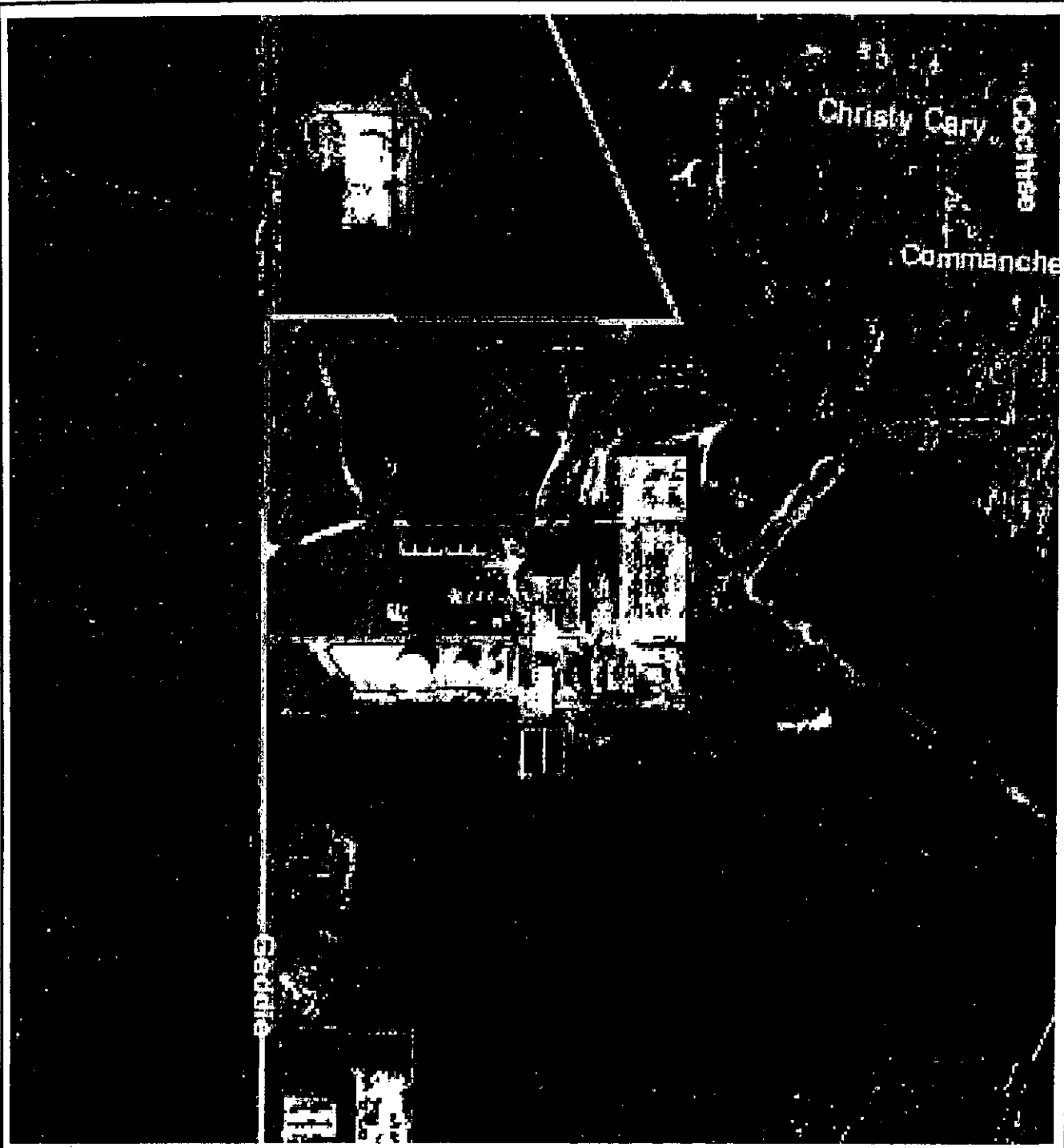



The Phoenix
Environmental
Group, Inc.

Figure 1
Location Map
Tallahassee, FL

Source:
Microsoft
Maps and
Streets





 <p>The Phoenix Environmental Group, Inc.</p>	<p>Figure 4 Infrared Aerial</p>	<p>Source: DEP, 1999</p> <p>↑ N</p>
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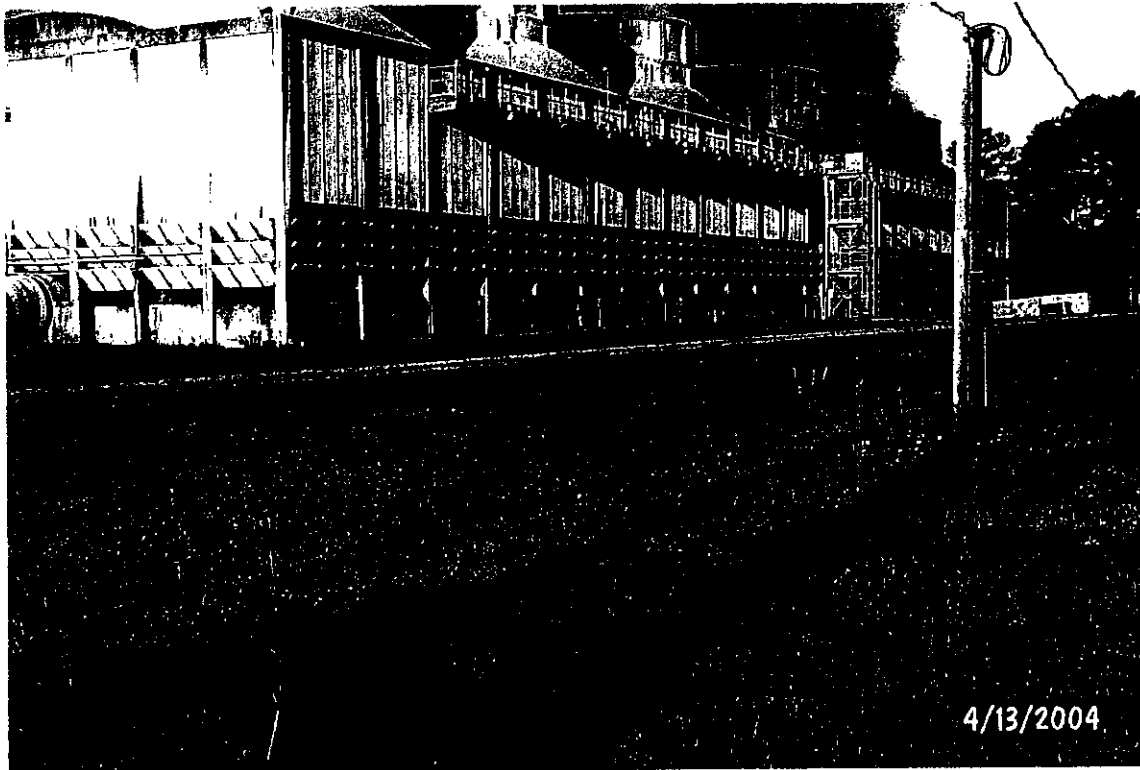


Location for temporary generator storage



Location of temporary generator storage

2
19 5 19



View of ditch along south side of temporary generator storage area



View to southwest of temporary generator storage area